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August 6, 2024

VIA ECF

Hon. J. Paul Oetken
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 20D
New York, NY 1007

Re: Joint status letter and joint proposed briefing schedule for cross-motions for summary judgment.

Crespo v. Gutman, Mintz, Baker & Sonnenfeldt, LLP, Case 1:22-cv-6599-JPO

Dear Judge Oetken:

The undersigned represents Plaintiff Jose Crespo in this above-entitled action bringing claims alleging, *inter alia*, violations of the Fair Debt Collection Practices Act. Defendants are a law firm whose practice includes the collection of debts on behalf of its clients, Gutman, Mintz, Baker & Sonnenfeldt, LLP (“GMBS”), an attorney at the firm, Eric Keilbach, and an individual debt collector at the firm, Gary Thigpen (collectively the “Gutman Defendants”). Plaintiff and the Gutman Defendants are collectively “the Parties.” Two other Defendants, a landlord, 1511 Sheridan, LLC, and a property management company, Hilltop Management Group, LLC, have been served but have defaulted.

I write on behalf of all parties to provide the joint status letter as ordered by the Court on July 16, 2024.

The Parties engaged in mediation on July 31, 2024 through the Southern District Mediation Program. The mediation lasted from 10:00 AM to approximately 3:00 PM with Cyrus Dugger, a panel mediator agreed to by the Parties. The Parties were unable to reach a settlement.

Consequently, pursuant to § 3(E) of the Honorable Judge Oetken’s Individual Rules and Practices in Civil Cases, the Parties jointly request the following briefing schedule for summary judgment and respectfully request leave for additional pages for some of the cross-filings.

Movant	Motion	Number of Days (from August 7) and Dates	Page Limit
Gutman Defendants	Gutman Defendants shall file their opening brief in support of their motion for summary judgment.	21 days (August 28)	30
Plaintiff	Plaintiff shall file his single brief in opposition to Gutman Defendants' motion for summary judgment and in support of Plaintiff's own cross-motion for summary judgment.	21 days (September 18)	45
Gutman Defendants	Gutman Defendants shall file a single reply brief both in support of their motion for summary judgment and in opposition to Plaintiff's cross-motion for summary judgment	21 days (October 9)	40
Plaintiff	Plaintiff shall file his reply brief in support of his motion for summary judgment.	14 days (October 23)	25

The Parties thank the Court for its consideration.

Respectfully,

/s/

Ahmad Keshavarz, Esq.

Attorney for Plaintiff